

# **EXHIBIT 5**

**From:** Max Dehon <mdehon@smbb.com>

**Sent:** Tuesday, January 28, 2025 4:41 PM

**To:** Davis, Jeff <jsdavis@bradley.com>; Jessica Riddle <jriddle@zarwin.com>; Robinson, Michelle <mrubinson@smbb.com>; Amy L. Barrette <amy.barrette@bipc.com>; Budner, Michael <MBudner@smbb.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

**Cc:** Chante DePersia <cndepersia@zarwin.com>; Christopher G. Mavros <cgmavros@zarwin.com>

**Subject:** RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

Add Matt Heaton to the list as well please. Thanks.

**Max Dehon**

Attorney



One Liberty Place, 1650 Market Street, 52<sup>nd</sup> Floor,

Philadelphia, PA 19103  
+1 215.854.2533 (direct) | +1 913.982.7143 (cell)  
[mdehon@smbb.com](mailto:mdehon@smbb.com) | [www.smbb.com/attorney/max-dehon/](http://www.smbb.com/attorney/max-dehon/)

**From:** Max Dehon

**Sent:** Tuesday, January 28, 2025 4:40 PM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

Jeff – we would like to depose Jeremiah Brosner, Jordan Bass, Mike Skuce, Tom Boze, and Derek Coffey.

Please let us know February dates that work for these witnesses.

Additionally, as noted in my other email, please produce the TOC of the safety manual. If you can do so before the end of this week that would be great in the event there is an objection from you related to certain portions.

Thanks,

--

**Max Dehon**

Attorney



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**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>

**Sent:** Tuesday, January 14, 2025 12:22 PM

**To:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Max Dehon <[mdehon@smbb.com](mailto:mdehon@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

You don't often get email from [jsdavis@bradley.com](mailto:jsdavis@bradley.com). [Learn why this is important](#)

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Jessica:

I am in receipt of your email. I will work to accommodate this schedule, but as you note I am considering this a "tentative" schedule and not formal notices. I would be surprised if all the witnesses are available on the date noticed, but I will try to slot in the witnesses as they are individually available on the date and time slots noted below. That is, they may not be presented in this particular order. If you want them in a particular order, I will need to know that now as that may impact the ability to schedule them. As noted previously, several of the witnesses are no longer employed with Precision, but we will work to get them scheduled. If we are unsuccessful, we will let you know and proceed accordingly.

Jeff

**Jeff Davis**

Partner | [Bradley](#)  
[jsdavis@bradley.com](mailto:jsdavis@bradley.com)  
d: 713.576.0370

**From:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>

**Sent:** Tuesday, January 14, 2025 10:46 AM

**To:** Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Max Dehon <[mdehon@smbb.com](mailto:mdehon@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

Good Morning,

Please see the attached deposition notices and subpoena. For your convenience, you can find the tentative schedule below as well.

January 28, 2025

9:00 a.m. Brody Webster – Coterra, confirmed

1:00 p.m. Bob Goodwin – Precision

January 30, 2025

9:00 a.m. Frank Estes - Coterra, confirmed

February 18, 2025

9:00 a.m. Troy Holliday - Precision

1:00 p.m. Craig Watts – Former Coterra, subpoena attached

February 19, 2025

9:00 a.m. Matt Wallace - Precision

1:00 p.m. Magella Mainguy - Precision

February 24, 2025

9:00 a.m. Kingsley Meniffee - Precision

1:00 p.m. Jeremi Wagner - Precision

February 25, 2025

9:00 a.m. Bailey Jeffords - Precision

1:00 p.m. Mark Bennett - Precision

March 3, 2025

9:00 a.m. Joseph Fox - Precision

1:00 p.m. Justin Guthrie – Franks International

Thank you!



**Jessica Riddle, Paralegal**

One Commerce Square

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**From:** Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>

**Sent:** Monday, January 13, 2025 3:10 PM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Max Dehon <[mdehon@smbb.com](mailto:mdehon@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>;

[delylechappellz1579379@smb.filevineapp.com](mailto:delylechappellz1579379@smb.filevineapp.com)

**Subject:** RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

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Hi. Plaintiff's have marked/held their calendars best they can on the below dates with exception:

March 4, 2025 NOT available.

Also – tentative trial pool assignment on 3/10 – so might not be an ideal date, as of now.

Thx.

**Michelle Robinson**

Litigation Paralegal



One Liberty Place, 1650 Market Street, 52<sup>nd</sup> Floor,  
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[mrubinson@smbb.com](mailto:mrubinson@smbb.com) | [www.smbb.com](http://www.smbb.com)

**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>

**Sent:** Monday, January 13, 2025 2:30 PM

**To:** Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Max Dehon <[mdehon@smbb.com](mailto:mdehon@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; [delylechappellz1579379@smb.filevineapp.com](mailto:delylechappellz1579379@smb.filevineapp.com)

**Subject:** RE: updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

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Michelle:

I need to know the dates in which Michael is unavailable.

Some of the witness requested are no longer employed, but we will work to get them scheduled.

However, I need to know the dates in which all parties are available before I started trying to schedule. My experience is that sometimes it is difficult to reach former employees and being able to schedule them with a slate of dates in only one call is much more efficient and successful.

Jeff

**Jeff Davis**

Partner | [Bradley](#)  
[jsdavis@bradley.com](mailto:jsdavis@bradley.com)  
d: 713.576.0370

**From:** Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>

**Sent:** Thursday, January 9, 2025 11:38 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Max Dehon <[mdehon@smbb.com](mailto:mdehon@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; [delyiechappellz1579379@smb.filevineapp.com](mailto:delyiechappellz1579379@smb.filevineapp.com)

**Subject:** updated list RE: Chappell v Precision Forum's request for deposition dates in January and February

Counsel,

\*I notice our associate Max Dehon, who works with Drew and Mike- is not on any of these threads – so I am adding him.

Please use this updated list, so Max does not feel left out of all the fun.  
Thanks.

**Michelle Robinson**

Litigation Paralegal



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**From:** Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>

**Sent:** Thursday, January 9, 2025 12:30 PM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle

<[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in January and February

Counsel, good afternoon:

By way of a summary for scheduling, I would like to confirm the below:

Broady Webster is confirmed for 1/28/25 at 10am. Zoom.

Frank Estes is confirmed for 1/30/25 at 10am. Zoom.

The following witnesses are ideally, to be slotted into the available dates below (that Coterra and Forum are available). Zoom only:

**DEPONENTS:**

Craig Watts  
Bob Goodwin  
Troy Holliday  
Matt Wallace  
Magella Mainguy  
Kingsley Meniffee  
Jeremi Wagner  
Bailey Jeffords  
Mark Bennett  
Joseph Fox  
Justin Guthrie

**AVAILABLE DATES:**

- February 18
- February 19
- February 24
- February 25
- March 3
- March 4
- March 5
- March 6
- March 7
- March 10



*Plaintiffs are actively working on confirming availability of the above dates asap.*

**Michelle Robinson**

Litigation Paralegal



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**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>

**Sent:** Thursday, January 9, 2025 12:04 PM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Chris & Michael:

Of the dates provided by Amy, I am currently available on the following – assuming that the requested depositions will be taken remotely:

- February 18
- February 19
- February 24
- February 25
- March 3
- March 4
- March 5
- March 6
- March 7
- March 10

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Sent:** Thursday, January 9, 2025 10:49 AM

**To:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024  
**Importance:** High

Chris,

Coterra is available to participate in the depositions for the 10 witnesses identified below on the following dates: February 3-7, 10-11, 17-21, 24-28 and March 3-7 and 10. Given that these are not likely full 7 hour depositions, it makes sense to try to schedule more than one per day.

Amy

**Amy Barrette**  
Shareholder

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**From:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>  
**Sent:** Thursday, January 9, 2025 11:09 AM  
**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Good Morning,

I have not received a response from anyone except Amy, please see the below & provide dates. We would like to schedule the deposition of Bob Goodwin, Troy Holliday, Matt Wallace, Magella Mainguy, Kingsley Meniffee, Jeremi Wagner, Bailey Jeffords, Mark Bennett, Joseph Fox, and Justin Guthrie.

Additionally, attached are the deposition notices for Broady Webster & Frank Estes.

Thank you!



**Jessica Riddle, Paralegal**

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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Monday, December 16, 2024 2:03 PM  
**To:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024  
**Importance:** High

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Chris,

Brody Webster is available for his deposition on January 28, 2025. Please let me know as soon as possible whether you plan to proceed on that day. For the remainder of the depositions, I am available to participate on the following dates: January 30, February 3-7, Feb 17-21, and Feb 24-28.

**Amy Barrette**  
Shareholder

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501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

**Buchanan**

[vCard](#) | [Bio](#) | [BIPC.com](#) | [Twitter](#) | [LinkedIn](#)

**From:** Jessica Riddle <[jriddle@zarwin.com](mailto:jriddle@zarwin.com)>

**Sent:** Monday, December 16, 2024 11:14 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Good Morning,

We would like to schedule the deposition of Brody Webster, Bob Goodwin, Troy Holliday, Matt Wallace, Magella Mainguy, Kingsley Meniffee, Jeremi Wagner, Bailey Jeffords, Mark Bennett, Joseph Fox, and Justin Guthrie. Please provide availability for late January & February.

Thank you!



**Jessica Riddle, Paralegal**

One Commerce Square  
2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
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**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>

**Sent:** Friday, November 8, 2024 10:25 AM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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If it is the 23<sup>rd</sup>, then I am fine with that.

**Jeff Davis**

Partner | [Bradley](#)  
[jsdavis@bradley.com](mailto:jsdavis@bradley.com)  
d: 713.576.0370

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Friday, November 8, 2024 9:10 AM  
**To:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024  
**Importance:** High

Jeff,

I haven't received a response from you on the dates proposed below for Mr. Brown. The start time will have to be 3:35 Central time.

Thanks

**Amy Barrette**

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(she/her)

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**Buchanan**

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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Tuesday, November 5, 2024 12:26 PM  
**To:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner



<[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Given counsels' schedule conflicts, we will not be able to proceed with Mr. Estes' deposition in December. Do any of you want to proceed with Mr. Brown's deposition the week of the 23<sup>rd</sup> or 30<sup>th</sup> if he is available? I do not want to waste time trying to schedule him during that time if counsel is not available. I also want to eliminate any future suggestion that Coterra delayed depositions.

## Amy Barrette

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(she/her)

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## Buchanan

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**From:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>

**Sent:** Tuesday, November 5, 2024 11:10 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

I also have a trial that is scheduled to start on 12/9. It's NJ, so it's technically just a listing, but it's our 9<sup>th</sup> or 10<sup>th</sup> listing, so I'm fairly certain that will go, which means I would be unavailable the weeks of 12/9 and 12/16.

## Michael Budner

Partner



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**From:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>

**Sent:** Tuesday, November 5, 2024 11:07 AM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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All:

My trial that was set for 12/2 has been moved to the week of 12/9, which will likely go the full week and would jeopardize proceeding on 12/12 and 12/13.

We have already mediated the case with no success and we are No. 1 on the docket.

Given the vagaries of trial, I don't have a problem noticing the deposition with the understanding that if I am still in trial, that they will need to be postponed.

Jeff

**Jeff Davis**

Partner | [Bradley](#)  
[jsdavis@bradley.com](mailto:jsdavis@bradley.com)  
d: 713.576.0370

**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>

**Sent:** Tuesday, November 5, 2024 9:38 AM

**To:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

Neither I nor Coterra has any control over Mr. Brown's schedule at this point, so I cannot guarantee he will be available during the 12<sup>th</sup>- 17<sup>th</sup>, or at any time in December. If all counsel could give me their availability for the 12<sup>th</sup> through the 17<sup>th</sup>, that would be a great start.

**Amy Barrette**  
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(she/her)

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## Buchanan

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**From:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Sent:** Monday, November 4, 2024 2:51 PM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** Re: Chappell v Precision Forum's request for deposition dates in December 2024

Thanks, Amy. Would be good to schedule these on the same day if possible.



**Christopher G. Mavros, Esq.**

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2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Monday, November 4, 2024 2:29 PM  
**To:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Rubinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Mr. Estes is available for his deposition on the following dates: 12/12, 12/13, 12/16, or 12/17. Please confirm by the end of the week whether any of those dates work for you so that we can lock this in place before his schedule changes. I should have dates for Mr. Brown shortly.

Amy

**Amy Barrette**  
Shareholder  
(she/her)

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
412 562 1626 (o)  
[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)

**Buchanan**

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---

**From:** Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>  
**Sent:** Friday, November 1, 2024 3:12 PM  
**To:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>;

Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: Chappell v Precision Forum's request for deposition dates in December 2024

That's fine with me, as well. Thanks.

**Michael Budner**

Partner



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**From:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>

**Sent:** Friday, November 1, 2024 2:04 PM

**To:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** Re: Chappell v Precision Forum's request for deposition dates in December 2024

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Amy, I am fine with these deps being conducted remotely. Thanks



**Christopher G. Mavros, Esq.**

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**From:** Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>  
**Sent:** Thursday, October 31, 2024 11:43 AM  
**To:** Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>; Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Rubinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>; Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>  
**Cc:** Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>  
**Subject:** Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Given the holidays, December is not ideal for the depositions, but I will work on dates. There are logistical issues. Mr. Estes's office is in Texas. If he has to travel, that will impact his available dates. Do all counsel agree to conduct his deposition via video? If not, I propose the deposition be held at Buchanan's office in Pittsburgh. This location will be easier for everyone traveling. That beats everyone having to travel to Susquehanna County.

Please let me know as soon as possible.

**Amy Barrette**  
Shareholder  
(she/her)

Union Trust Building  
501 Grant Street, Suite 200  
Pittsburgh, PA 15219-4413  
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## Buchanan

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**From:** Jessica Agger <[jagger@zarwin.com](mailto:jagger@zarwin.com)>

**Sent:** Thursday, October 31, 2024 8:34 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** RE: #44410 Chappell - Discovery Requests

Good Morning Counsel,

We are withdrawing out requests to Cabot. We would like to schedule depositions of Shane Brown & Frank Estes. Please let me know availability for December.

Thank you!



**Jessica Agger, Paralegal**

One Commerce Square  
2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
Direct Dial: [215.569.2800](tel:215.569.2800) |  
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**From:** Jessica Agger

**Sent:** Friday, October 25, 2024 9:56 AM

**To:** Davis, Jeff <[jsdavis@bradley.com](mailto:jsdavis@bradley.com)>; Matthew Pilsner <[matthew.pilsner@bipc.com](mailto:matthew.pilsner@bipc.com)>; Budner, Michael <[MBudner@smbb.com](mailto:MBudner@smbb.com)>; Amy L. Barrette <[amy.barrette@bipc.com](mailto:amy.barrette@bipc.com)>; Howard, Ty <[thoward@bradley.com](mailto:thoward@bradley.com)>; Tara Klingensmith <[tara.klingensmith@bipc.com](mailto:tara.klingensmith@bipc.com)>; Robinson, Michelle <[mrubinson@smbb.com](mailto:mrubinson@smbb.com)>; Bell, Andy <[abell@bradley.com](mailto:abell@bradley.com)>; Duffy, Andrew R. <[ADuffy@smbb.com](mailto:ADuffy@smbb.com)>

**Cc:** Christopher G. Mavros <[cgmavros@zarwin.com](mailto:cgmavros@zarwin.com)>; Chante DePersia <[cndepersia@zarwin.com](mailto:cndepersia@zarwin.com)>

**Subject:** #44410 Chappell - Discovery Requests

Good Morning,

Attached please find Defendant, Forum Tech's discovery requests directed to all parties.

Thank you!



**Jessica Agger, Paralegal**

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2005 Market Street | 16<sup>th</sup> Floor | Philadelphia, PA 19103-7042  
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